

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Janine Wood, Individually and as Parent and
Natural Guardian of Her Minor Child, H.W.,
et al.,

Plaintiffs,

vs.

Palace Entertainment, d/b/a Kennywood
Park, et al.,

Defendant.

Case No. 2:20-cv-01029-DSC

DEFENDANT’S MOTION FOR SUMMARY JUDGMENT

Defendant Festival Fun Parks, LLC d/b/a Palace Entertainment (“Palace”)¹ hereby moves the Court for summary judgment on the grounds that the material facts are undisputed and Palace is entitled to summary judgment as a matter of law. *See* Fed. R. Civ. P. 56(a).

This motion is based on this motion, the accompanying brief in support, concise statement of material facts, supporting appendix, and the proposed order.

WHEREFORE, Palace respectfully requests that the Court grant this motion.

¹ The defendant identified in plaintiffs’ complaint, “Palace Entertainment d/b/a Kennywood Park, Sandcastle Waterpark, and Idlewild and Soakzone,” is not a legal entity. The owner and operator of Kennywood Park, Sandcastle Waterpark, and Idlewild & SoakZone is Festival Fun Parks, LLC d/b/a Palace Entertainment.

Date: April 27, 2022

Respectfully submitted,

McDermott Will & Emery LLP

/s/ Kerry Alan Scanlon

Kerry Alan Scanlon (admitted *pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all Counsel of Record.

/s/ Kerry Alan Scanlon

Kerry Alan Scanlon